

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	]	
	]	
v.	]	Cr. No. 19-cr-142-LM
	]	
	]	
NATHAN CRAIGUE		

NOTICE OF OBJECTIONS TO GOVERNMENT’S EXHIBITS

Nathan Craigue, through his attorneys, AFPD Dorothy Graham and AFPD Behzad Mirhashem, respectfully notifies the Court that he objects to the following government exhibits on the following grounds:

Exhibit 100- Objection under Rules 401-403. (A) The Court has ruled that adverse findings by OSHA are inadmissible. Document 70 at 8. This letter was submitted in order to “contest” an OSHA finding. (B) The letter has minimal probative value because the assertion that Mr. Craigue’s position was that McKenna was an independent contractor is provable through other evidence available to the government. (C) The letter confuses issues and is unfairly prejudicial because it sets out the legal position of the insurance carrier, as opposed to Mr. Craigue’s own understanding.

Exhibits 101 and 102 – Objection under Rule 802. These documents are out-of-court statements of McKenna not falling within a hearsay exception.

Exhibit 103 – Objections under Rule 802 and 901. This document purports to be an out-of-court statement of McKenna, which does not fall within a hearsay exception.

Exhibits 201 and 202: Objection under Rule 403. The photographs have minimal probative

value that is substantially outweighed by their unfairly prejudicial nature, given the presence of police tape indicative of a crime scene, and the placement of the ladders.

Exhibit 400: Objection on two grounds. (A) Authentication. (B) The exhibit has a number of documents attached to it which may not have been originally with the contract.

Exhibit 404: This exhibit contains a large number of documents, not all of which are relevant.

Exhibit 406: Objection on authentication grounds. This document purports to reflect information obtained from Christos Lianos, but the document appears to have been generated by the government and it is not clear that it accurately reflects Lianos's information.

Exhibit 500: The defense needs additional time to determine its position on the admissibility of this exhibit.

Exhibit 501: Objection on hearsay grounds. This exhibit summarizes some of the information contained in Exhibits 102 and 103, to which the defense has objected on hearsay grounds.

Respectfully submitted,

Date: June 1, 2021

/s/ Dorothy E. Graham  
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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was served on the following person on June 1, 2021 and in the manner specified herein: electronically served through CM/ECF to AUSA John Davis, AUSA Anna Dronzek, and AUSA Aaron Gingrande.

/s/Dorothy E. Graham

Dorothy E. Graham